

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

TEAL PEAK CAPITAL, LLC;

*Plaintiff and Counter Defendant,*

And

JOHN MICHAEL GRZAN AND NAMRATA  
KHIMANI

*Counter Defendant,*

v.

ALAN BRAM GOLDMAN;

*Defendant and Counter Claimant.*

Case No. 3:20-CV-01747 (PAD)

BREACH OF CONTRACT; SPECIFIC  
PERFORMANCE OF CONTRACT;  
REIMBURSEMENT OF FUNDS, COSTS  
AND EXPENSES

**ALAN BRAM GOLDMAN'S MOTION FOR EXTENSION OF TIME  
TO ANSWER THE AMENDED COMPLAINT OR OTHERWISE PLEAD**

**TO THE HONORABLE COURT:**

COMES NOW defendant Alan Bram Goldman (hereinafter, "Mr. Goldman") through the undersigned attorney, and very respectfully states and prays:

1. On May 28, 2021, Plaintiff Teal Peak Capital, LLC filed an *Amended Complaint* against Mr. Goldman. *See*, Docket No. 50. Pursuant to the above, Alan Bram Goldman's term to answer the amended complaint or otherwise plead expires on June 11, 2021. *See* Fed. R. Civ. P. 15(a)(3).

2. This being said, Mr. Goldman respectfully requests from this Honorable court to allow him an extension of time of seven (7) days, set to expire on June 18, 2021, in order to file his answer to the amended complaint or other responsive pleading. This extension is being sought in good faith and will not unnecessarily delay the proceedings.

3. By requesting this extension the Defendant does not waive and reserves all rights as to any available defenses it may assert against the amended complaint.

WHEREFORE, the Defendant requests that the Court allow him an extension of time until June 18, 2021, to file his answer to the amended complaint or other responsive pleading.

Respectfully Submitted

In San Juan, Puerto Rico, this 10th day of June 2021.

**McConnell Valdés LLC**

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*Attorney for Alan Bram Goldman*

IT IS HEREBY CERTIFIED that on this date we filed a true and correct copy of the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice electronically to all counsel at their address of record.

Date: June 10, 2021

By: s/Antonio A. Arias-Larcada  
Attorney